

IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

MICHAEL LEWIS AND GENEVA	)	
D. LEWIS, individually,	)	
	)	Case No. 18-50186
Plaintiffs,	)	
	)	Honorable Frederick J. Kapala
	)	
v.	)	Honorable Iain D. Johnston
	)	
300 WEST, LLC, an Illinois Limited	)	JURY TRIAL DEMANDED
Liability Company, <i>et al.</i>	)	

**NOTICE OF MOTION**

Please take notice that on Tuesday, September 18, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Magistrate Judge Iain D. Johnson, or any judge sitting in his stead, in Courtroom 5600, Stanley J. Roszkowski United States Courthouse, 327 South Church Street Rockford, IL 61101, and present the Unopposed Motion for Leave to File in Excess of 15 Pages.

/s/Jennifer T. Nijman

One of the Attorneys for Defendants Arnold  
Magnetic Technologies Corporation, Arnold  
Magnetic Technologies Holdings Corporation,  
Compass Group Diversified Holdings LLC,  
Flexmag Industries, Inc, and The Arnold  
Engineering Co.

Jenifer T. Nijman  
Kristen L. Gale  
Nijman Franzetti LLP  
10 South LaSalle Street, #3600  
Chicago, IL 60603  
[jn@nijmanfranzetti.com](mailto:jn@nijmanfranzetti.com)  
[kg@nijmanfranzetti.com](mailto:kg@nijmanfranzetti.com)

**CERTIFICATE OF SERVICE**

The undersigned, Jennifer T. Nijman, an attorney, hereby certifies that the Arnold Defendants' *Unopposed* Motion For Leave to File in Excess of 15 Pages and the Notice of Motion were served on September 12, 2018, in accordance with Fed.R.Civ.P. 5, LR 5.5, and the General order on Electronic Case Filing (ECF), pursuant to the district court's ECF system as to the ECF filers, and was sent by first class mail or by hand delivery to non-ECF filers, if any.

/s/Jennifer T. Nijman

One of the Attorneys for Defendants Arnold  
Magnetic Technologies Corporation, Arnold  
Magnetic Technologies Holdings Corporation,  
Compass Group Diversified  
Holdings LLC, Flexmag Industries, Inc., and The  
Arnold Engineering Co.

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

MICHAEL LEWIS and GENEVA D. LEWIS,  
individually,

Plaintiffs,

v.

300 WEST LLC, an Illinois limited liability  
company, et al.,

Defendants.

Case No. 3:18-cv-50186

Hon. Frederick J. Kapala

Magistrate Judge Hon. Iain D. Johnston

**ARNOLD DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE IN  
EXCESS OF 15 PAGES**

Defendants, Arnold Magnetic Technologies Corporation, Arnold Magnetic Technologies Holding Corporation, Compass Group Diversified Holdings LLC, Flexmag Industries, Inc., and The Arnold Engineering Co. (collectively, the Arnold Defendants), pursuant to Local Rule 7.1 of the United States District Court, Northern District of Illinois, respectfully request leave to file a memorandum in support of their Motion to Dismiss not to exceed 30 pages. In support of this motion, the Arnold Defendants state as follows:

1. The deadline for defendants to file their motion to dismiss and supporting memorandum is September 28, 2018. Local Rule 7.1 authorizes this Court to grant leave to file memoranda in excess of the 15-page limit set forth in the Rule.

2. Plaintiffs' complaint names 15 separate entities as defendants. In order to avoid overburdening the Court, undersigned counsel is filing a joint memorandum on behalf of multiple defendants: Arnold Magnetic Technologies Corporation; Arnold Magnetic Technologies Holding

Corporation; Compass Group Diversified Holdings LLC, Flexmag Industries, Inc.; and The Arnold Engineering Co.

3. Each of the Arnold Defendants has different corporate histories and connections, if any, to the industrial property identified in the Complaint. As a result, each Arnold Defendant has unique bases to support a Motion to Dismiss.

4. Undersigned counsel is attempting to streamline its explanation of those respective corporate histories as much as is feasible. But these details are central to several arguments in the Arnold Defendants' brief, including the argument that Plaintiffs fail to offer a basis for personal jurisdiction over several of the Arnold Defendants. If this motion is denied, counsel will be required to file separate motions for each Arnold Defendant, each Motion incorporating portions of the other motions.

5. Undersigned has consulted with Plaintiffs' counsel and they have indicated that they have no objection to this motion.

WHEREFORE, the Arnold Defendants respectfully request that the Court grant them leave to file a memorandum of law in support of their Motion to Dismiss not to exceed 30-pages.

Respectfully submitted,

/s/Jennifer T. Nijman

Jennifer T. Nijman  
Kristen L. Gale  
Nijman Franzetti, LLP  
10 S. LaSalle Street, Suite 3600  
Chicago, IL 60603  
Phone: (312) 251-5250  
[jn@nijmanfranzetti.com](mailto:jn@nijmanfranzetti.com)  
[kg@nijmanfranzetti.com](mailto:kg@nijmanfranzetti.com)  
*Counsel for Arnold Defendants*